REMARKS

Claims 1-12 were examined. All claims were rejected. In this Response, Applicants amend claims 1, 6, 8 and 12, and add new claims 13-15, without adding new material. Support for the amendments and new claims is in Figures 5 and 6 and at Specification p. 9, line 15 through p. 12, line 11, and p. 12, lines 17-20. Consideration of the currently-presented claims in light of the following remarks is respectfully requested.

I.   Claims Rejected Under 35 U.S.C. § 112

The Examiner rejected claims 1, 8 and 12 under 35 U.S.C. § 112, first paragraph, for failing to comply with the written description requirement. Applicants have amended these claims to remove the word "semantic," which was added in the previous Amendment and Response, since that word does not appear in the Specification. Withdrawal of this rejection is respectfully requested.

The Examiner also rejected claims 1, 8 and 12 as indefinite under 35 U.S.C. § 112, second paragraph. At issue is the meaning of the phrase "grammar connected document," as used in the claims and described in the Specification at, e.g., p. 12, lines 14-23. Applicants previously stated that grammar-connected documents are ordinary text documents (Examiner's paraphrasing adopted here). This is correct; the Examiner should not be confused. Figure 1 shows an overview of the process. In particular, note that document grammar connector 400 takes grammar neutral document objects 210 and produces grammar-connected document 410. Grammar neutral document objects 210 are suitable for program processing in a computer system, as the claims recite, and grammar-connected document 410 is in human-readable string form. In other words, document grammar connector 400 produces a string recognizable by a user out of a computer-processable document form such as XML. The Specification

paragraph at p. 12, lines 14-23 explains this process, but the paragraph must be read as a whole. If one stops reading midway through the paragraph at line 20, as the Examiner's citation suggests, the process is incomplete and the meaning is not entirely clear. Applicants respectfully request that the Examiner revisit this paragraph of the Specification. If a telephonic discussion with Applicants' counsel would be useful, the Examiner is encouraged to contact the undersigned at 503-439-8778.

II.   Claims Rejected Under 35 U.S.C. § 103(a)

Claims §103(a) as being unpatentable over U.S. Patent No. 6,065,026 to Cornelia *et al.* ("*Cornelia*"), in view of *Special Edition Using Microsoft® Word 97* by Person *et al.* ("*Person*"), and further in view of "A Tool – Creating Validated XML Documents on the Fly Using MS Word" by Meyer ("*Meyer*"). Applicants have reviewed the references of record and believe that their teachings can be described generally as follows. *Cornelia*: natural language documents are produced by combining fragments of other natural-language documents selected from a library with text that is specific to the document being produced. *Person*: word processor templates facilitate consistent formatting of natural-language documents (*e.g.* font size and selection, margins, indenting, and similar layout features). *Meyer*: software tool constructs an XML document corresponding to (or in conjunction with) a natural-language document. These references describe techniques and systems in the same general field as embodiments of the invention, but for the specific reasons detailed below, they fail to teach or suggest Applicants' claimed subject matter, even assuming (solely for the sake of argument) that the references could properly be combined as the Examiner suggests.

Claim 1 recites an automatic document generation system comprising several elements, including a component assembler for processing assembly rules and assembling document components from the document component

library, and a context processor for processing context rules and creating a grammar neutral document object from the assembled document components. These two elements, whose operations are described in Figures 5 and 6, make up a document generation rule processor, as shown in Figure 4. ·The Examiner identified the document generation rule processor with the "tree viewer" described at *Cornelia* col. 20, ll. 60-65. However, *Cornelia*'s structure is a single step or phase operation: "[d]ocuments are created by dragging and dropping language components into a list for the document. Once the list has been created, the actual word processor document with a complete content can be generated by the click of a button." That is, *Cornelia*'s system goes directly from a list of language components to a completed document. By contrast, Applicants' claimed document generation rule processor includes two phases: a component assembler and a context processor. Furthermore, neither of the two phases produces a completed document. Instead, Applicants' document generation rule processor creates a grammar neutral document object, which is further processed by a document grammar connector for converting the grammar neutral document object into a grammar-connected document that is in a human-readable string form for use in an actual business.

Claim 6 provides further details of the component assembler and context processor recited in claim 1. The Examiner conceded that *Cornelia* fails to disclose these details, but relied on *Person*'s Fig. 6.2 to supply the missing material. This figure shows a "fill-in-the-blank" form for a 401(k) savings plan, but much of the Examiner's speculation about how the form works, and what goes on behind the interface, is unsupported by any portion of *Person*. Furthermore, the context processor introduced in claim 1 and detailed in claim 6 creates a grammar-neutral document object, not a finished document like the one that could prepare by typing information into a fill-in form. Thus, even assuming that *Person* could properly be combined with *Cornelia*, the references

fail to teach or suggest a component assembler and context processor that operate as required by claim 6.

The Examiner also presents an analysis of the claimed grammar-neutral document objects, arguing that although *Cornelia* and *Person* fail to disclose converting such objects, *Meyer* teaches a tool to create valid XML documents by converting Microsoft Word documents. This characterization of *Meyer* is reasonably accurate, but the direction of conversion is wrong. Applicants' invention converts grammar-neutral document objects (which may be XML, as recited in new claim 14), into grammar-connected documents that are in a human-readable string form for use in an actual business. This is almost the reverse of *Meyer*'s teachings ("almost," because *Meyer* actually teaches a tool that permits a user to manipulate both the XML document and the human-readable document; it is not limited to an automatic conversion in only one direction. However, to the extent that there *Meyer* has an automatic conversion, it *is* in the wrong direction.)

For at least the foregoing reasons, claims 1 and 6, and claims 2-5 and 7, which depend directly or indirectly on claim 1, and are believed to be patentable over the references of record. Applicants respectfully request that the Examiner withdraw these rejections.

Independent claims 8 and 12 have been amended to contain limitations similar to those discussed in regard to claim 1 and its dependent claims. Applicants respectfully submit that these claim families are patentable over the references of record for similar reasons.
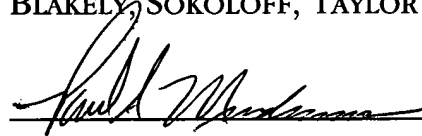
New claims 13-15 explicitly recite that the grammar-neutral document objects in their respective base claims are Extensible Markup Language ("XML") documents. As explained above, XML documents constructed by the systems and methods claimed, are unlike any XML documents taught or suggested by the references of record. Thus, Applicants respectfully request that the Examiner allow these claims.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending, namely claims 1-15, patentably define the subject invention over the prior art of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (503) 439-8778.

Respectfully submitted,
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN, LLP

Dated: <u>October 18, 2006</u>

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